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THAT ONE VIDEO ENTERTAINMENT, LLC, a  
California limited liability company

**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

THAT ONE VIDEO  
ENTERTAINMENT, LLC, a  
California limited liability company,

Plaintiff,

vs.

KOIL CONTENT CREATION PTY  
LTD., an Australian proprietary  
limited company doing business as  
NOPIXEL; MITCHELL CLOUT, an  
individual; and DOES 1-25, inclusive,

Defendants.

CASE NO: 2:23-cv-02687 CAS (JCx)

[Assigned to the Hon. Stephen V. Wilson;  
Ctrm 10A]

**DECLARATION OF BENJAMIN LAU**

*[Status Report filed concurrently herewith]*

**Hearing**

Date: September 24, 2024

Time: 9:30 a.m.

Dept.: Courtroom 10A (10th Floor)  
350 W. First Street

Los Angeles, CA 90012

Judge: Hon. Stephen V. Wilson

Action Filed: April 10, 2023

Trial Date: September 17, 2024

**DECLARATION OF BEJAMIN LAU**

I, Benjamin Lau, declare and state as follows:

1. I am an attorney duly licensed to practice law in the State of California and before this Court, and am over 18 years of age. I am a principal at the law firm Jackson Lewis, P.C., which is immigration counsel for THAT ONE VIDEO ENTERTAINMENT, LLC, a California limited liability company ("Plaintiff"), the Plaintiff in this action. I hereby submit this Declaration in conjunction with the Joint Status Report filed by Plaintiff and Defendants KOIL CONTENT CREATION PTY LTD., an Australian proprietary limited company doing business as NOPIXEL ("NoPixel") and MITCHELL CLOUT, an individual ("Clout") (collectively, "Defendants"). I know all of the following facts of my own personal knowledge and, if called upon and sworn as a witness, could and would competently testify thereto.

2. I can confirm that I had no conversations with THAT ONE VIDEO ENTERTAINMENT, LLC, regarding the existence of a "loan-out" company. THAT ONE VIDEO ENTERTAINMENT, LLC, never informed me of the existence of a loan-out company or any agreement with a loan-out company.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this Declaration was executed on September 10, 2024, at Los Angeles, California.

  
BENJAMIN LAU